



**City of Edmonds  
2014  
Stormwater Management Program (SWMP) Plan**

**Permittee Coverage Number: WAR04-5513**

**City of Edmonds  
121 5<sup>th</sup> Avenue North  
Edmonds, WA 98020**

**By**

**Jerry Shuster, P.E.  
Stormwater Engineering Program Manager**

**April 30, 2014**

**This page left intentionally blank**

## TABLE OF CONTENTS

1	INTRODUCTION .....	1
1.1	The Stormwater Management Program Plan .....	1
1.2	Stormwater Management in Edmonds .....	5
1.3	Document Organization.....	5
2	STORMWATER MANAGEMENT PLAN ELEMENTS .....	6
2.1	Public Education and Outreach .....	6
2.1.1	Permit Requirements .....	6
2.1.2	Ongoing Activities.....	6
2.1.3	Planned Activities.....	9
2.2	Public Involvement and Participation .....	11
2.2.1	Permit Requirements .....	11
2.2.2	Recent and Ongoing Activities.....	11
2.2.3	Planned Activities.....	12
2.3	Illicit Discharge Detection and Elimination .....	13
2.3.1	Permit Requirements .....	13
2.3.2	Ongoing Activities.....	14
2.3.3	Planned Activities.....	14
2.4	Controlling Runoff from New Development, Redevelopment, and Construction Sites .....	15
2.4.1	Permit Requirements .....	15
2.4.2	Ongoing Activities.....	17
2.4.3	Planned Activities.....	17
2.5	Pollution Prevention and Operation and Maintenance for Municipal Operations .....	18
2.5.1	Permit Requirements .....	18
2.5.2	Ongoing Activities.....	19
2.5.3	Planned Activities.....	19
2.6	Monitoring and Assessment .....	20
2.6.1	Requirements .....	20
2.6.2	Recent/Ongoing Activities.....	20
2.6.3	Planned Activities.....	20
3	REFERENCES .....	21

## LIST OF TABLES

<b><u>Table</u></b>		<b><u>Page</u></b>
1	Western Washington Phase II Municipal Stormwater Permit Schedule Overview- 2013 to 2018 .....	3
2	Ongoing Public Education and Outreach Activities .....	7
3	Recent Public Involvement and Participation Opportunities.....	12

# 1 INTRODUCTION

This document has been prepared in accordance with the *Western Washington Phase II Municipal Stormwater Permit* (the Permit). The Permit was issued by the Department of Ecology (Ecology) to municipalities with populations of less than 100,000 as operators of small and medium municipal separate storm sewer systems (MS4s). More than 80 medium and small cities, including the City of Edmonds (Edmonds) and urban portions of five counties in western Washington, must comply with the provisions the Permit. This five-year permit was issued by Ecology on August 1, 2012, and is effective from August 1, 2013 through July 31, 2018, or until the next permit becomes effective.

The Permit authorizes the discharge of stormwater runoff from MS4s into the state's surface waters (i.e., streams, rivers, lakes, sounds, wetlands, etc.) and groundwater as long as municipalities implement Permit-specified actions and activities known as Best Management Practices (BMPs) to protect these receiving waters. Permit requirements are phased in over the 5-year permit term per a specified schedule. Some of the required BMPs are carry-overs from the previous Permit while other requirements are new. Table 1 presents the overall implementation schedule of the current Permit. Additional schedule detail can be found in the full text of the Permit found on Ecology's website at:

<http://www.ecy.wa.gov/programs/wq/stormwater/municipal/phaseIIww/5YR/WWPhaseIIPermit2013.pdf>

## 1.1 The Stormwater Management Program Plan

Section S5.A of the Permit requires each Permittee to develop and implement a Stormwater Management Program (SWMP). Each Permittee must also annually prepare written documentation of the SWMP, called the SWMP Plan. This Plan is intended to be a forward-looking document describing the set of actions and activities (BMPs) the Permittee intends to complete in the upcoming calendar year to comply with the Permit.

This SWMP Plan is organized per S5.C of the Permit and will be updated at least annually for submittal with Edmonds' annual reports to Ecology. This first SWMP under the current Permit does not have an accompanying annual report<sup>1</sup>.

The BMPs are grouped under the following Program components:

- Public Education and Outreach
- Public Involvement and Participation
- Illicit Discharge Detection and Elimination (IDDE)
- Controlling Runoff from New Development, Redevelopment, and Construction Sites
- Municipal Operations and Maintenance (O&M)

In addition, the Permit requires reporting and, if applicable, implementation of water-body-specific cleanup plans developed by Ecology. To date, Ecology has not developed such plans for Edmonds' water bodies.

---

<sup>1</sup> Per Section S9 of the Phase II Permit, the initial annual report shall be submitted no later than March 31, 2015.

This page left intentionally blank

**TABLE 1**  
**Western Washington Phase II Municipal Stormwater Permit Schedule Overview – 2013 to 2018**

<b>S5 Program Component</b>	<b>August 1, 2013 Ongoing program implementation</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>Jan-July 31, 2018</b>
<b>A. Stormwater Management Plan</b>	Continue to track costs, actions and activities. Continue required internal and suggested external coordination and SWMP Plan submittal w/annual report. Update SWMP Plan annually.		<b>By March 31:</b> annual report includes description of internal coordination			
<b>C.1 Public Education and Outreach</b>	Continue public education and outreach program. Measure changes in behavior for 1 audience & 1 topic.	Create or partner w/others to create stewardship.		<b>By February 2:</b> use measures of behavior changes to improve program.		
<b>C.2 Public Involvement</b>	Continue to provide ongoing opportunities for the public to participate in SWMP decision-making. Post online annual reports and SWMP Plan for previous calendar year by 5/31 of each year.					
<b>C.3 Illicit Discharge Detection and Elimination (IDDE)</b>	Continue implementing the enforceable mechanism to prohibit illicit discharges, compliance strategy, IDDE and municipal staff training, citizen hotline and IDDE response, and maintain map of MS4.				<b>By Dec 31:</b> Field screen at least 40% of MS4 & on average 12% each year thereafter.	<b>By Feb 2:</b> Update ordinance if needed.
<b>C.4.a-f Control Runoff from New Develop't, Redevelop't Construction Sites</b>	Continue to implement ordinance addressing construction/post-construction runoff controls; make NOIs for construction, industrial stormwater permits available; site plan review & permitting, requiring long-term maintenance; inspections; training; and enforcement.			<b>By Dec 31:</b> Update City code to revised Appendix 1 standards; review, revise, make effective development codes to make LID preferred approach.	<b>By March 31:</b> Submit summary of review & revision of codes to reduce impervious surface, protect vegetation, minimize runoff.	Achieve at least 80% of scheduled inspections.
<b>C.4.g Watershed scale stormwater planning (selected permittees)</b>	<b>(By Oct. 31, 2013</b> Phase I permittee notifies Ecology of selected basin and affected Phase II permittees; convenes planning process.)	<b>(By April 1:</b> Scope of work submitted to Ecology by Phase I watershed plan lead.)	Participate in planning process, if located within selected basin.	<b>By Oct 1:</b> Phase I lead submits final watershed scale stormwater plan to Ecology.		
<b>C.5 Municipal Pollution Prevention, Operation and Maintenance</b>	Continue implementation of MS4 maintenance; annually inspect stormwater treatment & flow control BMPs/facilities; spot checks; O&M & SWPPPs for municipal lands & facilities; staff training			<b>By Dec 31:</b> Update maintenance standards to revised manual/code standards	<b>By August 1:</b> Inspect all catch basins or document alternatives if used. Plan to complete inspections every 2 years thereafter.	Achieve 95% of inspections for municipal stormwater treatment/flow control BMPs/facilities and catch basins.

**Table 1 (continued)**

S8 Monitoring & Assessment	August 1, 2013	2014	2015	2016	2017	July 31, 2018
S8.A	Continue to provide description in each annual report of stormwater monitoring or stormwater- related studies conducted by permittee or others (except if related to S8.B or S8.C.					
S8.B Status and Trends Option #1	PS Permittees ONLY:  By Dec 31: Notify Ecology which option selected for status and trends monitoring.	PS Permittees ONLY : By Aug 15: First annual payment to RSMP.				
S8.B Status and Trends Option #2		By July 31: Begin monitoring wadeable streams.	Oct 1: Begin monitoring nearshore marine (if applicable).	Annual reporting as per Ecology-approved QAPP.		
C. Effectiveness Option #1	By Dec 31: Notify Ecology which option selected for effectiveness monitoring.	By Aug 15: Option #1 first annual payment to RSMP.				
C. Effectiveness Option #2		By Feb 2: Submit QAPP to Ecology. By Oct 1: Begin flow monitoring.	Oct 1: Stormwater monitoring program fully implemented.	Annual reporting as per Appendix 9 in the Permit.		
S8.D Source ID & Diagnostic Monitoring		By Aug 15: First annual payment to RSMP.				

Source: Modified from: <http://www.ecy.wa.gov/programs/wq/stormwater/municipal/phaseIIww/wwwphiipermit.html>

BMP = Best Management Practices  
ID = Identification  
IDDE = Illicit Discharge Detection & Elimination  
LID = Low Impact Development  
MS4= Municipal Separate Storm Sewer System  
O & M = Operations and Maintenance

PS = Puget Sound  
QAPP = Quality Assurance Program Plan  
RSMP = Regional Stormwater Monitoring Program  
SWMP = Stormwater Management Program  
SWPPP = Stormwater Pollution Prevention Plan



This SWMP Plan covers the City of Edmonds' activities being undertaken in 2014 to comply with the Phase II permit and those planned for next year and in some cases, in the out years.

## **1.2 Stormwater Management in Edmonds**

Edmonds is the oldest incorporated city in Snohomish County. Logger George Brackett founded Edmonds in 1890. It has a population of approximately 40,000 and covers approximately 9 square miles of land area. Edmonds is approximately 94 percent built-out with the vast majority of the land-use as single-family or multi-family residential (City of Edmonds 2010). The majority of the stormwater runoff from Edmonds eventually drains into Puget Sound with the balance entering the greater Lake Ballinger watershed that discharges into Lake Washington.

Edmonds is committed to meeting the compliance requirements and deadlines of the Permit. The stormwater management program in Edmonds is led by the City's Stormwater Engineering Program Manager in the City's Public Works Department, Engineering Division, with assistance from the Stormwater Technician. The Stormwater Technician primarily works on public education, illicit discharges, and post-construction inspection of stormwater management facilities. The Stormwater Engineering Program Manager works closely with the following:

- Public Works Department
  - Street/Storm Manager and Crew
  - City Engineer, Engineering Program Manager, and Technicians
  - Recycling Coordinator
- Development Services Department – Planners, Code Enforcement
- Parks Department - Environmental Education Coordinator.

The City's Stormwater Engineering Program Manager coordinates with colleagues in the adjacent communities of Mountlake Terrace, Lynnwood, and Shoreline on SWMP-related issues. These issues include Lake Ballinger water quality and maintenance of stormwater pipes that cross jurisdictional boundaries.

Edmonds continues to track costs associated with the program's action and activities as required by both the current and previous Permit.

## **1.3 Document Organization**

The remaining sections of this document have been organized to follow the sequence of the Permit requirements S5.C.1 through S5.C.5, as well as the new requirements for S8, monitoring and assessment. Permit requirements, current/ongoing activities, and planned activities for each of the required elements are presented.

## **2 STORMWATER MANAGEMENT PLAN ELEMENTS**

This section discusses the SWMP elements.

### **2.1 Public Education and Outreach**

The required elements for a public education and outreach program (Section S5.C.1 of the Permit) are summarized below, followed by a description of the ongoing and planned SWMP activities that meet these requirements.

#### **2.1.1 Permit Requirements**

Permit Section S5.C.1. states that the SWMP shall include an education and outreach program designed to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts and encourage the public to participate in stewardship activities. The education program may be developed and implemented locally or regionally. The Permit lists the following minimum performance measures for compliance with this element. Each Permittee shall:

- Provide an education and outreach program for the area served by the MS4. The program shall be designed to educate target audiences about the stormwater problem and provide specific actions they can follow to minimize the problem.
- Create stewardship opportunities and/or partner with existing organizations to encourage residents to participate in activities such as stream teams, storm drain marking, volunteer monitoring, riparian plantings and education activities.
- Measure the understanding and adoption of the targeted behaviors for at least one target audience in at least one subject area. No later than February 2, 2016, Permittees shall use the resulting measurements to direct education and outreach resources most effectively, as well as to evaluate changes in adoption of the targeted behaviors. Permittees may meet this requirement individually or as a member of a regional group.

#### **2.1.2 Ongoing Activities**

The Permit requires the City to continue public education and outreach program and measure changes in behavior for at least one audience in at least one subject area. Since Edmonds is predominantly residential, the target audience is homeowners and the subject area is yard care techniques to protect water quality. Other important topics include proper storage and disposal of pesticides, fertilizers and other household chemicals, and BMPs for carpet cleaning, auto and home repair and maintenance.

The City currently provides the educational materials and public outreach activities summarized in Table 1. In 2013, the City of Edmonds sanctioned a follow-up survey to measure the understanding of the public's knowledge and practices regarding stormwater quality issues. This

study was compared to a baseline study completed in 2009 to identify target audiences and subject areas in regards to stormwater issues. The follow-up survey showed that there are general and specific stormwater issues that are a priority for public education and outreach in Edmonds. For instance, less than half of those surveyed in 2013 knew that the stormwater drains are not connected to the sanitary sewer system and that stormwater is discharged untreated to local streams, lakes, and Puget Sound. Additionally, less than half of those surveyed knew that the primary cause of stormwater pollution is the action of individuals, not industrial polluters. Specific stormwater topics that are a priority include how natural yard care practices can decrease stormwater pollution, and that detecting and fixing vehicle leaks can also decrease stormwater pollution.

These results as well as the requirements in the current Phase II Permit are the guide for the City's current and future public Education and outreach program.

The City is and will continue to partner with numerous organizations to encourage residents' participation in educational opportunities. Current and near future partnering organizations include:

- Snohomish County Surface Water Management
- Snohomish Conservation District
- STORM (Stormwater Outreach for Regional Municipalities)
- Washington State University Extension
- ECOSS (Environmental Coalition of South Seattle)

**Table 2                      Ongoing Public Education and Outreach Activities**

<b>Educational Material/Activity</b>	<b>Description of Educational Material/Activity</b>	<b>Phase II Permit Sections(s)</b>
<b>Brochures, Booklets, Fact Sheets and Other Written Material</b> (hard copies available from Engineering Dept. at City hall , the Parks Dept. or on City Website)		
Stormwater Management Handouts (E72 series)	Walks developers and homeowners through classifying their site and defining the applicable minimum requirements to comply with the recently update stormwater management code.	S5.C.1.a.i (build awareness) S5.C.1.a.ii (effect behavior change)
Where in the World Is Your Watershed? brochure	Brochure describes pollutant sources from lawns and gardens, pet wastes, land clearing and construction activity, and vehicles. It provides a list of actions that citizens can do to protect their watershed.	S5.C.1.a.i (build awareness) S5.C.1.a.ii (effect behavior change)
Streamside Landowners Best Management Practices web page	This portion of the City's website discusses leaving stream banks natural, planting native plants and trees, limiting the use of lawn chemicals, proper car washing, and keeping pets out of streams. <a href="http://www.edmondswa.gov/services/sustainability/water-conservation/streamside-stewardship.html">http://www.edmondswa.gov/services/sustainability/water-conservation/streamside-stewardship.html</a>	S5.C.1.a.i (build awareness) S5.C.1.a.ii (effect behavior change)

<b>Educational Material/Activity</b>	<b>Description of Educational Material/Activity</b>	<b>Phase II Permit Sections(s)</b>
Let's Discreetly Discuss Fluffy's Pet Waste brochure	Brochure prepared by the Snohomish County Solid Waste Management Division that outlines best practices for pet waste disposal. <a href="http://www.co.snohomish.wa.us/documents/Departments/Public_Works/SolidWaste/Information/Brochures/petwastebro05.pdf">http://www.co.snohomish.wa.us/documents/Departments/Public_Works/SolidWaste/Information/Brochures/petwastebro05.pdf</a>	S5.C.1.a.i (build awareness) S5.C.1.a.ii (effect behavior change)
Natural Yard Care booklet	This booklet was prepared by Seattle/King County and Washington State University Extension and is available at Edmonds City Hall.	S5.C.1.a.i (build awareness) S5.C.1.a.ii (effect behavior change)
How to be a Salmon Friendly Gardener brochure	Brochure describes building healthy soil with compost, using natural fertilizers, directing runoff to pervious areas, and protecting shoreline habitat.	S5.C.1.a.i (build awareness) S5.C.1.a.ii (effect behavior change)
Safer Alternatives for the Home and Garden fact sheets	Fact sheets prepared by the Washington Toxics Coalition that describes alternatives to common toxic products for control of slugs, aphids, and weeds, and choosing fertilizers. <a href="http://watoxics.org/healthy-living/healthy-homes-gardens-1/factsheets">http://watoxics.org/healthy-living/healthy-homes-gardens-1/factsheets</a>	S5.C.1.a.i (build awareness) S5.C.1.a.ii (effect behavior change)
Protecting Water Quality in Urban Runoff	Fact sheet published by USEPA that discusses urbanization's effect on the quality & quantity of stormwater runoff and what can be done to best manage this runoff. <a href="http://cfpub.epa.gov/npstbx/files/NPS_Urban-facts_final.pdf">http://cfpub.epa.gov/npstbx/files/NPS_Urban-facts_final.pdf</a>	S5.C.1.a.i (build awareness) S5.C.1.a.ii (effect behavior change)
Protecting Washington's Waters from Stormwater Pollution	Eight page environmental education guide that discusses a variety of topic related to stormwater runoff and presents ways to protect receiving water from the detrimental effects of uncontrolled stormwater runoff. <a href="https://fortress.wa.gov/ecy/publications/publications/0710058.pdf">https://fortress.wa.gov/ecy/publications/publications/0710058.pdf</a>	S5.C.1.a.i (build awareness) S5.C.1.a.ii (effect behavior change)
City of Edmonds Stormwater Education and Outreach web page	Reorganized and expanded the City's Stormwater Education and Outreach web page to provide more information on stormwater and stormwater regulations, including FAQs, and information on car washing, vehicle leaks, and links to City and regional outreach brochures, articles, and web pages.	S5.C.1.a.i (build awareness) S5.C.1.a.ii (effect behavior change)
Utility Bill Insert – illicit discharge	Educational insert discussing illicit discharge issues was mailed to utility customers in February 2014.	S5.C.1.a.i (build awareness) S5.C.1.a.ii (effect behavior change)
Car Wash brochures	Car wash brochures that discuss the issues of car wash water in the storm drains. One brochure is focused on how to best handle washing cars at home, the other covers the use of the City's car wash kit for fund raising events. The brochures are available on the City website and at the City's Development Services help desk.	S5.C.1.a.i (build awareness) S5.C.1.a.ii (effect behavior change)
Stormwater article in City's electronic newsletter	Article in City electronic newsletter, on City web page, discussing the City's spill kit program for businesses, posted in January 2014.	S5.C.1.a.i (build awareness) S5.C.1.a.ii (effect behavior change)
<b>Self-Guided Interpretive Tours</b>		
Watershed Mystery Tour in Yost Park	Self-guided tour map that provides information on the general impacts of stormwater runoff and the impacts of growth and development <a href="http://www.edmondswa.gov/images/COE/Services/Education/discovery-programs/Downloads/WSMT.pdf">http://www.edmondswa.gov/images/COE/Services/Education/discovery-programs/Downloads/WSMT.pdf</a>	S5.C.1.a.i (build awareness) S5.C.1.a.ii (effect behavior change)

<b>Educational Material/Activity</b>	<b>Description of Educational Material/Activity</b>	<b>Phase II Permit Sections(s)</b>
<b>Classroom Presentations, Curriculum and Activities</b>		
Shared Waters booklet	This booklet is used in elementary schools primarily for salmon education; it also discusses storm drains, hazardous waste disposal, pet waste disposal, washing cars, and landscaping.	S5.C.1.a.i (build awareness) S5.C.1.a.ii (effect behavior change)
<b>Other</b>		
Mutt Mitt pet waste stations	“Leash and Scoop” signs are posted throughout Edmonds. Mutt Mitt pet waste stations are located at 9 parks and public areas in Edmonds, including the City dog park near Marina Park. The stations are maintained by City of Edmonds Parks and Recreation staff.	S5.C.1.a.i (build awareness) S5.C.1.a.ii (effect behavior change)
“Puget Sound Starts Here” Decals on City Vehicles	The City placed 14 in. x 6in. “Puget Sound Starts Here” decals on the 8 vehicles used by the Stormwater group. These vehicles are out on the streets of Edmonds daily for residents to see.	S5.C.1.a.i (build awareness)
Stormwater Community Research Report	Edmonds sanctioned a survey in 2013 of a sample of its residents to measure the public’s knowledge and practices regarding stormwater quality issues, and to compare to a baseline study conducted in 2009. This study will be used for targeting future public education and outreach activities and for measuring change in target behaviors from future public education and outreach activities. The report has been posted on the City’s stormwater outreach web page.	S5.C.1.a.i (build awareness) S5.C.1.a.ii (effect behavior change)
Charity car wash kit	Charity car wash kits with car wash runoff control materials are available to organizations that host car washes. The kit includes 30 car wash kit program brochures for interested organizations.	S5.C.1.a.i (build awareness) S5.C.1.a.ii (effect behavior change)
Participation in regional municipal stormwater educational forums/groups.	Regularly attend local and regional meetings convened to share and promote outreach resources and techniques. The group was formed with the intent of educating the general public and specific interest groups about stormwater and the impacts of stormwater on our environment. The City of Edmonds hosted the regional meeting on February 13, 2014.	S5.C.1.a.i (build awareness) S5.C.1.a.ii (effect behavior change)

### 2.1.3 Planned Activities

In 2014 the City plans on continuing all of the public education and outreach activities presented in Table 1. Additional public education and outreach activities are planned to comply with new requirements of the Phase II permit, including programs that are designed to measure understanding of particular subject areas and the adoption of behavior change.

- Assist with coordination of and participation in the annual City-run Watershed Fun Fair, to educate participants on stormwater issues and the actions that can minimize the problem.
- Prepare stormwater education articles for the City newsletter, which is published three times annually on the City web site.
- Create additional stormwater education materials on selected topics for utility bill insert mailings.

- Participation in and promotion of Puget Sound Starts Here month, which is May of each year, a regional effort to educate about the effects of stormwater on the health of Puget Sound and actions we can take to help.
- Facilitate storm drain stenciling by local school and other community groups.
- Continue to participate with local and regional STORM (Stormwater Outreach for Regional Municipalities) groups to partner in outreach and education programs.
- Participate in the Natural Yard Care program, facilitated by Snohomish County and funded by a GROSS grant, by assisting with local workshop set-up and participating in advisory groups.
- Partner with Snohomish County/Washington State Extension on a Don't Drip and Drive project.
- Continue theater announcements of general stormwater information.

## **2.2 Public Involvement and Participation**

The SWMP requirements for public involvement and participation (Section S5.C.2 of the Phase II permit) are summarized below followed by a description of the recent and planned SWMP activities that meet these requirements.



*The City of Edmonds provides opportunities for public involvement in its stormwater management program*

### **2.2.1 Permit Requirements**

Section S5.C.2. of the Phase II Permit states that Permittees shall provide ongoing opportunities for public involvement and participation through advisory councils, public hearings, watershed committees, participation in developing rate-structures, or other similar activities. Each Permittee shall comply with applicable state and local public notice requirements when developing elements of the SWMP. The minimum performance measures are:

- Permittees shall create opportunities for the public to participate in the decision-making processes involving the development, implementation and update of the Permittee's SWMP.
- Each Permittee shall post on their website their SWMP Plan and the annual report required under S9.A no later than May 31 each year. All other submittals shall be available to the public upon request.

### **2.2.2 Recent and Ongoing Activities**

Table 2 briefly describes the recent SWMP items that included public participation prior to approval by City Council.

**Table 3      Recent Public Involvement and Participation Opportunities**

<b>Date</b>	<b>Stormwater Program Public Involvement and Participation Opportunity</b>	<b>Phase II Permit Section</b>
June 11, 2013	The City Council's Finance and Planning, Parks and Public Works committees reviewed potential stormwater utility rate increases for 2014, 2015, and 2016. These meetings are open to the public. The committees recommended the proposed rate increases reviewed by the full City Council.	S5.C.2.a
July 23, 2013	City Staff made a presentation on options to increase stormwater utility rates to the City Council. These meetings are open to the public.	S5.C.2.a
November 19, 2013	Public Hearing on proposed utility rate increases, including those for the stormwater utility.	S5.C.2.a
December 3 and December 17, 2013	Public Hearings on City budget that included funding for the SWMP BMPs and City stormwater capital projects.	S5.C.2.a

The Permit requires that the City continue to provide ongoing opportunities for the public to participate in SWMP decision-making, and post online annual reports and SWMP Plan for previous calendar year by May 31<sup>st</sup> each year.

### **2.2.3 Planned Activities**

No additional requirements are in the current Permit for public involvement. Since the stormwater utility rate increases approved by the City Council in late 2013 are applicable through 2016, no new rate adjustment discussions are planned until sometime in 2015. The City plans to update its Storm and Surface Water Comprehensive plan in 2015 or 2016 that will include an extensive public involvement process.



## 2.3 Illicit Discharge Detection and Elimination

The SWMP requirements for illicit discharge detection and elimination (IDDE) (Section S5.C.3 of the Phase II permit) are summarized below, followed by a description of the ongoing and planned SWMP activities that meet these requirements.



*An illicit discharge of hydraulic fluid near 76<sup>th</sup> Ave W. (discharges to Lake Ballinger).*

### 2.3.1 Permit Requirements

Section S5.C.3. of the Phase II permit states that the SWMP shall include an ongoing program designed to prevent, detect, characterize, trace and eliminate illicit connections and illicit discharges into the MS4. The minimum performance measures are:

- Mapping of the MS4 shall continue on an ongoing basis. MS4 maps shall be periodically updated.
- Each Permittee shall implement an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges into the Permittee's MS4 to the maximum extent allowable under state and federal law.
- Each Permittee shall implement an ongoing program designed to detect and identify non-stormwater discharges and illicit connections into the Permittee's MS4.
- Each Permittee shall implement an ongoing program designed to address illicit discharges, including spills and illicit connections, into the Permittee's MS4.
- Permittees shall train staff who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills, and illicit

connections, to conduct these activities. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements or staffing. Permittees shall document and maintain records of the training provided and the staff trained.

- Recordkeeping: Permittees shall track and maintain records of the activities conducted to meet the requirements of this section.

### **2.3.2 Ongoing Activities**

The Permit requires the City to continue implementing the enforceable mechanism to prohibit illicit discharges, have municipal staff training on illicit discharge detection, elimination and response, host a citizen hotline, and maintain an up to date map of the MS4. The City is currently implementing all these activities.

The following is a list of specific IDDE program activities for 2014 and the immediate future to comply with the Phase II permit, Section S5.C.3:

- The City will continue to respond to illicit discharges as they are discovered by staff or reported by concerned citizens or responsible parties.
- Continue partnership with ECOSS and their Spill Kits for Businesses program, which was initiated in 2013 to educate Edmonds' businesses on spill prevention and preparation.
- Begin development and implementation of field screening methodology for screening the City's stormwater drainage system to facilitate the detection of illicit connections and non-stormwater discharges.
- Evaluate and if necessary update the current IDDE program based on reviews of responses to spill incidents and other investigations of illicit discharges or connections.

### **2.3.3 Planned Activities**

The main new requirement in the current permit includes field screening of at least 40 percent of the City's MS4 by December 31, 2017. The City is also required to screen an additional 12 percent of the MS4 year thereafter. The City will begin to address this requirement in 2015.

## 2.4 Controlling Runoff from New Development, Redevelopment, and Construction Sites

The SWMP requirements for controlling runoff from new development, redevelopment, and construction sites (Section S5.C.4 of the Phase II permit) are summarized below, followed by a description of the ongoing and planned SWMP activities that meet these requirements.



*Stormwater Detention System for commercial development Highway 99*

### 2.4.1 Permit Requirements

Section S5.C.4.a-f of the Phase II permit lists the following requirements:

- Develop and implement an ordinance or ordinance revisions that address runoff from new development, redevelopment, and construction projects in a manner that meets the minimum requirements established by Ecology.
- Develop and implement a site planning process and selection and design criteria for best management practices (BMPs) that will protect water quality and reduce the discharge of pollutants to the maximum extent practicable.

- Develop and implement an approval process for new development that includes inspections of and enforcement of maintenance standards for private stormwater facilities.
- By December 31, 2016, revise and implement provisions in development code regarding techniques for low impact development (LID) that make LID the preferred and commonly-used approach to site development, in order to minimize impervious surfaces, native vegetation loss, and stormwater runoff in all types of development situations.
- Develop and implement a permitting process with plan review, inspection, and enforcement capability for both public and private projects to ensure sufficient stormwater management, proper installation and maintenance of erosion control BMPs and permanent stormwater facilities, and assignment of responsibility for post-construction maintenance.
- Inspect all construction sites before construction if they exhibit high potential for sediment transport during construction to ensure adequate erosion and sediment control BMPs, and again upon completion of construction to ensure proper installation of permanent stormwater controls.
- Implement an ordinance or other enforceable mechanism to verify long-term operation and maintenance (O&M) of post-construction facilities and BMPs.
- By December 31, 2016, establish standards for stormwater facility maintenance that are equivalent to those included in Ecology's Stormwater Management Manual for Western Washington (Ecology 2012).
- Conduct annual inspections of stormwater treatment and flow control facilities permitted by the City; inspect all new flow control and water quality treatment facilities for new residential developments that are part of a larger common plan for development or sale.
- Develop a record-keeping procedure for inspection reports, warning letters, notices of violations, and other enforcement records.
- Provide copies of notice of intent (NOI) letters to representatives of proposed new development and redevelopment projects.
- Train City staff responsible for implementing the program described above, including staff involved with permitting, plan review, construction site inspections, and enforcement.

Permit requirement S.5.C.4.g. (Watershed-scale planning) does not apply to Edmonds since Snohomish (the Phase I Permittee) has not selected a watershed that includes Edmonds in their watershed-scale planning process.

### **2.4.2 Ongoing Activities**

The City will continue to implement the ordinance addressing construction/post-construction runoff controls, make Notice of Intents (NOIs) available for sites that require a Construction Stormwater General Permit or an Industrial Stormwater Permit from Ecology, perform site plan review and permitting per the Edmonds Community Development Code Chapter 18.30 (Stormwater Management), perform construction and post-construction inspections, require long-term maintenance, and train Staff in all aspects of this Permit requirement.

### **2.4.3 Planned Activities**

The main new requirement in the current permit includes updating the City development code to comply with the Permit Appendix I standards. This updating includes reviewing and revising the applicable parts of the development code to make Low Impact Development (LID) the preferred approach. This update must be completed by December 31, 2016. In addition, the city must submit to Ecology a summary of the results of the LID review and revision process with the annual report due March 31, 2017.

The City will begin to address these requirements in 2015.

## 2.5 Pollution Prevention and Operation and Maintenance for Municipal Operations

This section summarizes Phase II permit requirements related to pollution prevention and O&M for municipal operations (Section S5.C.5) and describes current and planned SWMP activities related to these requirements.



*City Maintenance Crews Emptying Vactor Truck of Catch Basin Waste at Decant Facility*

### 2.5.1 Permit Requirements

Section S5.C.5.a-f of the Phase II permit lists the following requirements:

- By December 31, 2017, establish standards for stormwater facility maintenance that are equivalent to those included in Ecology's Stormwater Management Manual for Western Washington (Ecology 2012).
- Develop maintenance standards for facilities that currently do not have maintenance standards.
- Inspect municipally owned or operated permanent stormwater treatment and flow control facilities (other than catch basins) annually and take appropriate maintenance actions.



- Conduct spot checks of potentially damaged permanent treatment and flow control facilities (other than catch basins) after major (greater than 24-hour, 10-year recurrence interval rainfall) storm events.
- Inspect, and clean if necessary, all catch basins and inlets owned or operated by the City at least once by August 1, 2017, and then every two years thereafter. Compliance will be determined by the presence of an established inspection program designed to inspect all sites and achieving 95% of inspections.
- Establish and implement practices to reduce stormwater impacts associated with runoff from streets, parking lots, roads, or highways owned or maintained by the City and road maintenance activities conducted by the City.
- Establish and implement policies and procedures to reduce pollutants in discharges from all lands owned and maintained by the City, including parks, open space, road rights-of-way, maintenance yards, and stormwater treatment and flow control facilities.
- Develop and implement an ongoing training program for City employees whose construction, operations, or maintenance job functions may adversely affect stormwater quality.
- Develop and implement a stormwater pollution prevention plan for all heavy equipment maintenance or storage yards and material storage facilities owned or operated by the City.
- Maintain records of inspections and maintenance or repair activities.

### **2.5.2 Ongoing Activities**

The City will continue to maintain the City's MS4, annually inspect all City-owned stormwater treatment and flow control BMPs/facilities, perform spot checks of facilities on a regular basis, especially after large storm events, follow the Stormwater Pollution Prevention Plans for municipal lands & facilities, and provide appropriate staff training. In 2014, the City will increase the capacity of its decant facility at the Public Works Operations Yard to increase the amount and efficiency of handling vector waste and street sweepings.

### **2.5.3 Planned Activities**

The main new requirements in the current permit include:

- Updating the maintenance standards used by City crews to those in the revised stormwater code by December 31, 2016.
- Inspect all catch basins or document an alternative, equally protective approach, by August 1, 2017. Also, plan on completing inspections of all City-owned catch basin every 2 years, thereafter.

- Achieve 95 percent completion rate for inspecting all City-owned stormwater treatment and flow control BMPs/facilities.

## **2.6 Monitoring and Assessment**

This section summarizes Phase II permit requirements related to stormwater monitoring and assessment (Section S8) and describes current and planned activities related to these requirements.

### **2.6.1 Requirements**

Section S8 of the Phase II permit lists the following requirements:

- Provide a description of any monitoring activities conducted during reporting period, separate from Regional Stormwater Monitoring Program (RSMP).
- Status and trends monitoring - notify Ecology by December 1, 2013, whether the Permittee will pay into a collective fund (payment due August 15, 2014) to implement the RSMP status and trends monitoring in Puget Sound, or will conduct the monitoring separate from any collective effort.
- Stormwater effectiveness studies – notify Ecology by December 1, 2013, whether the Permittee will pay into a collective fund (payment due August 15, 2014) to implement RSMP effectiveness studies, or will conduct the monitoring separate from any collective effort.
- Source identification and diagnostic monitoring – each Permittee shall pay into a collective fund (payment due August 15, 2014) to implement the RSMP Source Identification Information Repository (SIDIR).

### **2.6.2 Recent/Ongoing Activities**

In 2013, the City notified Ecology that it will pay into the collective fund for the status & trends monitoring and the stormwater effectiveness studies. The first payments for the RSMP will be sent to Ecology on or before August 14, 2014.

### **2.6.3 Planned Activities**

The City will continue to implement the activities described above throughout the rest of the current permit term. In addition, the City will begin making annual payments to Ecology on August 15, to participate in the RSMP.



### **3 REFERENCES**

City of Edmonds. 2010. Storm and Surface Water Management Comprehensive Plan. October 2010.

Ecology. 2012. Stormwater Management Manual for Western Washington. August. Washington Department of Ecology publication 12-10-030.